UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, et al.,	Case No. 09-50026 (MG)
Debtors.	(Jointly Administered)
MOTORS LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee,	Adversary Proceeding Case No. 09-00504 (MG)
Plaintiff,	
vs.	
JPMORGAN CHASE BANK, N.A., et al.,	
Defendants.	

STIPULATION EXTENDING TIME TO FILE CROSS-CLAIMS AGAINST JPMORGAN CHASE BANK, N.A. BY BTG PACTUAL

This Stipulation is entered into by and between defendant BTG Pactual Chile S.A. Administradora General De Fondos ("BTG Pactual") and defendant JPMorgan Chase Bank, N.A. ("JPMCB").

WHEREAS, on March 31, 2017, BTG Pactual filed cross-claims against JPMCB (ECF No. 913) ("BTG Pactual Cross-Claims").

WHEREAS, on February 1, 2018, the Court so ordered the stipulation between BTG Pactual and JPMCB whereby BTG Pactual dismissed, without prejudice, the BTG Pactual Cross-Claims, and BTG Pactual and JPMCB agreed that if BTG Pactual refiled cross-claims on

or before January 31, 2018, the refiled cross-claims would be treated as if such cross-claims were filed on March 31, 2017 (ECF No. 1045).

WHEREAS, on February 1, 2018, the Court so ordered the stipulation whereby BTG Pactual and JPMCB agreed to further extend the deadline for BTG Pactual to refile crossclaims to April 2, 2018, on the terms set forth therein (ECF No. 1046).

WHEREAS, BTG Pactual and JPMCB wish to further extend the deadline for BTG Pactual to refile cross-claims.

IT IS HEREBY STIPULATED AND AGREED, by and among undersigned counsel, as follows:

- 1. BTG Pactual and JPMCB expressly reserve and preserve any and all rights and defenses each had with respect to the BTG Pactual Cross-Claims as of March 31, 2017.
- 2. If BTG Pactual refiles cross-claims on or before December 31, 2018, the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 31, 2017.
- 3. BTG Pactual and JPMCB may stipulate between and among themselves to further extensions of the deadline for BTG Pactual to refile cross-claims on the same terms set out herein without the need for a court order.

Dated: April 2, 2018

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

John M. Callagy Nicholas J. Panarella Martin A. Krolewski 101 Park Avenue

New York, New York 10178 Telephone: (212) 808-7800 Email: jcallagy@kelleydrye.com

WACHTELL, LIPTON, ROSEN & KATZ

By: /s/ Amy R. Wolf

Harold S. Novikoff Marc Wolinsky Amy R. Wolf Carrie M. Reilly 51 West 52nd Street

New York, New York 10019 Telephone: (212) 403-1000 Facsimile: (212) 403-2000 Email: MWolinsky@wlrk.com

Attorneys for Defendant and Cross-Claim Defendant JPMorgan Chase Bank, N.A. Dated: April 2, 2018

BEYS LISTON & MOBARGHA LLP

By: /s/ Joshua D. Liston

Joshua D. Liston

825 Third Avenue, 2nd Floor New York, New York 10022 Telephone: (646) 755-3600 Email: jliston@blmllp.com

Attorney for Defendant and Cross-Claimant BTG Pactual Chile S.A. Administradora

General De Fondos